

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a	§
BRAZOS LICENSING AND	§
DEVELOPMENT,	§ CIVIL ACTION 6:20-CV-00571-ADA
Plaintiff,	§ CIVIL ACTION 6:20-CV-00572-ADA
	§ CIVIL ACTION 6:20-CV-00573-ADA
	§ CIVIL ACTION 6:20-CV-00575-ADA
	§ CIVIL ACTION 6:20-CV-00576-ADA
	§ CIVIL ACTION 6:20-CV-00579-ADA
	§ CIVIL ACTION 6:20-CV-00580-ADA
	§ CIVIL ACTION 6:20-CV-00583-ADA
	§ CIVIL ACTION 6:20-CV-00584-ADA
	§ CIVIL ACTION 6:20-CV-00585-ADA
v.	§
GOOGLE LLC,	§
	§
Defendant.	§

**WSOU INVESTMENTS, LLC'S THIRD SET OF
INTERROGATORIES TO DEFENDANT GOOGLE**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiff WSOU Investments, LLC (“WSOU”) requests that Defendant Google answer each of the following Interrogatories under oath in the manner and within the time prescribed by law.

DEFINITIONS

1. The terms “DEFENDANT,” “YOUR,” and “YOU” as used herein shall refer to Defendant Google LLC, as well as any parent, subsidiary, division, or related company, any business entity controlled by or operated on behalf thereof, any predecessors thereof, and any and all agents, directors, owners, officers, attorneys, employees, representatives, subcontractors, and/or any PERSON acting on its behalf.

2. The term “PLAINTIFF” as used herein shall refer to Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing, as well as any parent, subsidiary, division, or related company, any business entity controlled by or operated on behalf thereof, any predecessors thereof, and any and all agents, directors, owners, officers, attorneys, employees, representatives, subcontractors, and/or any PERSON acting on their behalf.

3. The phrase “ACCUSED INSTRUMENTALITY” refers to the instrumentalities identified in the complaint (as may be amended) as well as the infringement contentions served in this case (as may be amended).

INTERROGATORY NO. 11: If any ACCUSED INSTRUMENTALITY has been or will be designed, redesigned, altered, modified or changed in an effort to avoid infringement of any asserted claim, describe in detail the nature of that design, redesign, alteration, modification or change, explain in detail how such design, redesign, alteration, modification or change results in non-infringement of each asserted claim, including but not limited to identifying the specific claim limitation or limitations not practiced because of the change and state when the change was implemented in terms of both the date of the change and the version of the ACCUSED INSTRUMENTALITY that includes the change, identify all documents concerning that design, redesign, alteration, modification or change, and identify the person or persons most knowledgeable about the design, redesign, alteration, modification or change.

RESPONSE:

INTERROGATORY NO. 12: Describe in detail the complete legal and factual basis for each defense plead in Google's answer, including but not limited to: an identification of all facts supporting or refuting Google's defenses, all persons knowledgeable of these facts (including every person whose knowledge or opinion is or was relied upon as a basis for Google's defenses, the opinion or substance of such person's or persons' knowledge, and the entire basis of that knowledge or opinion), and all documents and things, including the Bates number(s) of such documents and things, concerning Google's defenses.

RESPONSE:

Dated: September 15, 2021

Respectfully Submitted,

/s/ Ryan S. Loveless

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LLC*

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served via email to all counsel of record on September 15, 2021.

/s/ Ryan S. Loveless

Ryan S. Loveless